

EXECUTIVE OFFICER SUMMARY REPORT  
December 10, 2003

ITEM: 6

SUBJECT: NPDES Permit Reissuance: Waste Discharge Requirements for the City of Escondido, Hale Avenue Resource Recovery Facility, Intermittent Wet Weather Discharge to Escondido Creek, San Diego County (tentative Order No. R9-2003-0394, NPDES Permit No. CA0108944) (*Bryan Ott*)

PURPOSE: To adopt updated waste discharge requirements and NPDES Permit for the intermittent wet weather discharge of up to 9.0 million gallons per day (MGD) of tertiary recycled water from the City of Escondido Hale Avenue Resource Recovery Facility (HARRF) to Escondido Creek. This Order would, if adopted, update and replace Order No. 98-10.

PUBLIC NOTICE: A notice of public hearing at the December 10, 2003 Regional Board meeting on this matter was issued on November 7, 2003 through the North County Times, serving as the required 30-day official public notification for this action. Tentative drafts of the Order, including the draft monitoring and reporting program (M&RP), were mailed on November 7, 2003 to the discharger and all known interested parties and agencies for review and comment. Copies of the tentative Order and M&RP have been made available for public review at the San Diego Regional Water Quality Control Board office.

DISCUSSION: The City of Escondido (City) provides wastewater collection, treatment, and disposal to areas within its incorporated boundaries. The City owns the HARRF and the land it occupies, and is responsible for operating and maintaining the treatment and disposal facilities. The City also manages the distribution and off-site use of the recycled water produced by the HARRF. Recycled water use is regulated under separate waste discharge requirements.

The HARRF has a design capacity of 16.5 MGD of secondary treated wastewater, of which an average of 9.0 MGD is treated to a tertiary level for recycled water use. Currently, the HARRF

discharges an average of 14.5 MGD of secondary effluent to the San Elijo Ocean Outfall via the Escondido Land Outfall. Although no discharge to Escondido Creek has occurred under Order No. 98-10 to date, the City wishes to maintain the Order in active status in case the need to discharge arises due to wet weather conditions.

The effluent limitations contained in tentative Order No. R9-2003-0394 for the discharge of tertiary treated wastewater to Escondido Creek are based principally on the 1994 Water Quality Control Plan for the San Diego Basin and the regulations governing recycled water use as contained in Title 22 of the California Code of Regulations. The priority pollutant criteria limitations in Order No. R9-2003-0394 were determined using the *California Permit Writer and Training Tool* (CAPWTT) model, in accordance with the California Toxics Rule (CTR) and Implementation Policy. Minimum secondary treatment requirements for TSS, CBOD, percent removal of TSS and CBOD, and pH are established by 40 CFR 133.102.

Copies of any comments received along with Regional Board responses will be provided in the next mailing to the Board members.

LEGAL CONCERNS:

None.

SUPPORTING DOCS:

1. Site Map
2. Tentative Order No. R9-2003-0394 including Monitoring and Reporting Program No. 2003-0394
3. Transmittal letter, dated November 7, 2003
4. Fact sheet
5. Cease and Desist Order No. 96-31
6. Addendum No.1 to Cease and Desist Order No. 96-31

SIGNIFICANT  
CHANGES:

Tentative Order No. R9-2003-0394 updates standard NPDES permit language.

Effluent limitations for bis (2-ethylhexyl) phthalate, bromoform, chlorodibromomethane, dichlorobromomethane, gamma-BHC, mercury, methylene chloride, selenium, and tetrachloroethylene were added. The limitations for these constituents were determined using the CAPWTT model, in accordance with the CTR and Implementation Policy, based on water quality data supplied by the City. The CAPWTT model was not a permit writer's tool at the time Order No. 98-10 was written and adopted.

In order to simplify evaluation of compliance with the requirements, effluent limitations were modified from 7-day, 30-day, and 12-month averages to weekly, monthly, and annual averages, respectively.

COMPLIANCE  
RECORD:

The City reported that the San Elijo Ocean Outfall (SEOO) capacity is limited by pressure restrictions on a 4,000-foot, 30-inch diameter section of the outfall (along the nearshore) which has a maximum pressure limit of 22-psi (50 feet). To protect the 30-inch diameter section from rupture, HARRF effluent is directed through a flow control station prior to discharge to the SEOO. The flow control station is equipped with an automatic valve that regulates land outfall flows to insure the design pressure of the nearshore segment is not exceeded. The City has experienced three episodes during the past several years when wastewater flows from the City exceeded the ocean outfall system during wet weather conditions. During those wet weather conditions, the City was forced to discharge secondary effluent to Escondido Creek in January 1993, March 1995, and January 1997.

On June 13, 1996, this Regional Board issued, "*Cease and Desist Order No. 96-31 for the City of Escondido*," for discharging secondary effluent to Escondido Creek during periods of sustained or significant rainfall in violation of the Federal Clean Water Act. Order No. 96-31 required the City either to pursue a strategy to increase the capacity of the San Elijo Ocean Outfall or to seek authorization for discharges of treated wastewater to Escondido Creek. The City chose the latter method of compliance resulting in the adoption of Order No. 98-10, NPDES Permit No. CA0108944. At the request of the City, on February 5, 2003 this Regional Board issued Addendum No. 1 to CDO No. 96-31 to extend the deadline for the City to complete measures to terminate all unauthorized

discharges to Escondido Creek and tributaries thereto from November 11, 2002 to June 16, 2003.

The City has completed construction of its tertiary wastewater treatment facilities. Currently the State Department of Health Services (State DHS) has yet to fully approve the City's Title 22 engineering report, citing concerns with the City's UV disinfection commissioning study. Although the City may not be considered in complete compliance with CDO No. 96-31 because of the lack of final State DHS approval of the UV system, tentative Order No. R9-2003-0394 for discharge to Escondido Creek is not affected, and thus, is being recommended for adoption at today's meeting. It is anticipated that the City will achieve compliance with State DHS regulations and CDO No. 96-31 in the near future.

**RECOMMENDATION:**

The adoption of tentative Order No. R9-2003-0394, NPDES Permit No. CA0108944 is recommended.